

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Robert J. Lemons

REILLY POZNER LLP
1900 16th Street, Suite 1700
Denver, Colorado 80202
Telephone: (303) 893-6100
Facsimile: (303) 893-6110
Michael A. Rollin

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**DECLARATION OF KERI REED
IN SUPPORT OF DEBTORS' ONE HUNDRED TWENTY FIFTH
OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION)**

Pursuant to 28 U.S.C. §1746, I, Keri Reed, declare:

1. I am over 18 years of age and have personal knowledge of all of the facts set forth in this declaration and if called upon to testify as a witness, I could testify to the truth of the matters set forth herein.

2. I submit this Declaration in support of *Debtors' One Hundred Twenty Fifth Omnibus Objection to Claims (Insufficient Documentation)* ("Objection").

3. I am an Assistant Vice President of LAMCO LLC. LAMCO LLC is a non-debtor subsidiary of Lehman Brothers Holdings, Inc. ("LBHI") that has been charged with

managing LBHI's assets. I have held this position since September 2010.

4. As a part of my duties as Assistant Vice President, I have contacted the claimant (the "Claimant") whose proofs of claim are identified in Exhibit A to the Objection, and have requested data supporting these claims in order to permit the Debtors to evaluate the validity of such claims. I requested both qualitative and quantitative data including but not limited to: the seller loan number; the buyer loan number; the servicer loan number and servicer name; the type of claim (i.e., misrepresentation of value); the address of the real property securing the mortgage loan; unpaid principal balance on the loan; and the status of the loan. Notwithstanding such requests, Claimant has not provided the Debtors with sufficient data or information as to the proofs of claim identified in Exhibit A to the Objection.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: April 15, 2011.

/s/ Keri Reed

Keri Reed